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Attorneys for Defendants
LG CHEM, LTD, and
LG CHEM AMERICA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES
ANTITRUST LITIGATION

Master File No. 4:13-md-02420-YGR
MDL NO. 2420

This Document Relates to:

Case No. 4:15-cv-3443-YGR

MICROSOFT MOBILE, INC., et al.
Plaintiffs,
v.

STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING THE LG CHEM
DEFENDANTS' TIME TO RESPOND TO
MICROSOFT MOBILE'S COMPLAINT

LG CHEM AMERICA, INC., et al.
Defendants.

Individual Action Plaintiffs Microsoft Mobile Inc. and Microsoft Mobile Oy (collectively “Microsoft Mobile”) and Defendants LG Chem, Ltd. and LG Chem America, Inc. (collectively “LG Chem”), together “the Parties,” through their respective counsel of record, hereby Stipulate as follows:

WHEREAS, the Parties entered into a stipulation on August 11, 2015 (ECF No. 776) (“Stipulation”) to waive service of Microsoft Mobile’s complaint filed on June 26, 2015 (“Microsoft Mobile’s Complaint” or “Complaint”) and to extend LG Chem’s deadline to respond to the Complaint by ninety (90) days from the date on which the Stipulation was entered as an Order of the Court; and

WHEREAS the Court entered an Order granting the Stipulation on August 12, 2015 (ECF No. 779), thereby setting the deadline for LG Chem to respond to Microsoft Mobile’s Complaint as November 10, 2015;

WHEREAS the Parties have met and conferred and desire to extend the deadline for LG Chem to respond to Microsoft Mobile’s Complaint to January 15, 2016;

WHEREFORE, it is stipulated:

1. LG Chem shall file an Answer to the Microsoft Mobile Complaint by or before January 15, 2016.

2. The Parties agree that this extension will not be used to prejudice Microsoft Mobile’s efforts to seek discovery in the above referenced action.

3. The parties agree that LG Chem does not waive and continues to preserve all of its defenses under the Federal Rules of Civil Procedure.

IT IS SO STIPULATED.

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Dated: November 6, 2015

Respectfully submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

ALSTON & BIRD LLP

By /s/ Reginald Steer

By /s/ B. Parker Miller

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and Microsoft Mobile Oy*

ATTESTATION

I, Mollie McGowan Lemberg, hereby attest, pursuant to Northern District of California Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from each signatory hereto.


Dated: November 6, 2015

By: /s/ Mollie McGowan Lemberg
Mollie McGowan Lemberg

IT IS SO ORDERED.

This Order terminates Dkt. No. 935 in the Master File and Dkt. No. 21 in Case No. 15-cv-03443.

Dated: November 9, 2015


The Honorable Yvonne Gonzalez Rogers
UNITED STATES DISTRICT JUDGE